

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND

2003 AUG

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RUSSIAN RESEARCH CENTER
THE KURCHATOV INSTITUTE,

Plaintiff,

v.

Case No.: AMD 02-3878

WESTERN SERVICES CORP., et al.,

Defendants and
Third-Party Plaintiff,

v.

GSE SYSTEMS, INC.

Third-Party
Defendants.

**MOTION OF DEFENDANT WESTERN SERVICES CORPORATION
TO SEAL THE ATTACHED REPLY MEMORANDUM IN SUPPORT OF
MOTION FOR A PROTECTIVE ORDER AGAINST ABUSIVE THIRD
PARTY DISCOVERY**

Defendant Western Services Corporation, through undersigned counsel,
respectfully moves the Court to seal his Reply Memorandum in Support of its Motion for a
Protective Order Against Abusive Third Party Discovery

Western Services Corporation would prefer to file the attached reply
memorandum in the public record. However, the reply memorandum quotes from and
attaches documents designated by GSE Systems, Inc. as "Confidential" under the

Protective Order of Confidentiality entered by this Court. The Protective Order is designed to protect the public disclosure of the parties' trade secrets or other confidential research, development, or commercial information, including but not limited to computer programming source code.

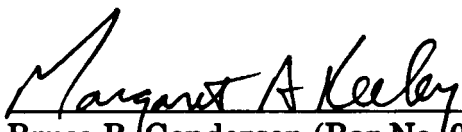
A sealing envelope containing the reply memorandum at issue is attached

CONCLUSION

For the foregoing reasons, Western Services Corporation respectfully requests that its reply memorandum be sealed

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

By: 
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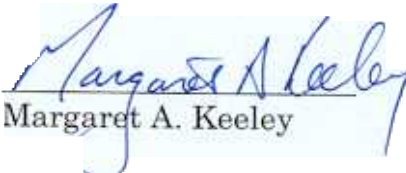
Dated: August 11, 2003

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Seal Reply Memorandum in Support of Motion for a Protective Order Against Abusive Third-Party Discovery was served on the following by FedEx on August 11, 2003:

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